

EEOC COMPLAINT

IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF GEORGIA  
DIVISION

APPENDIX D

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U.S. DISTRICT COURT  
MIDDLE DIST. OF GEORGIA  
MACON, GEORGIA

Floretta Respress  
Plaintiff

vs.

Crawford County BOE  
Defendant

**5:13-CV-355**

COMPLAINT

1. Plaintiff is a citizen of the United States and resides at PO Box 8190  
East Cruselle Street Roberta, Georgia 31078
2. Defendant(s) names(s) Crawford County Board of  
Education

Location of principal office(s) of the named defendant(s) Education Administration

Nature of defendant(s)' business Education Administration

Approximate number of individuals employed by defendant(s) 350

3. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on the Court by 42 U.S.C. § 2000e-5. Equitable and other relief are also sought under 42 U.S.C. § 2000e-5(g).

4. The acts complained of in this suit concern:

- (A) ☐ Failure to employ me.  
(B) ☒ Termination of my employment.  
(C) ☐ Failure to promote me.  
(D) ☐ Other Acts as specified below:

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5. Plaintiff is:

- (A) ☐ presently employed by the defendant(s).  
(B) ☒ not presently employed by the defendant(s).

The dates of this employment were \_\_\_\_\_

Employment was terminated because:

- (1) ☒ plaintiff was discharged.  
(2) ☐ plaintiff was laid off.  
(3) ☐ plaintiff left the job voluntarily.

6. Defendant(s) conduct is discriminatory with respect to the following:

- (A) ☐ my race.  
(B) ☐ my religion.  
(C) ☐ my sex.  
(D) ☐ my national origin.  
(E) ☒ other as specified below: **AGE DISCRIMINATION**

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7. The name(s), race, sex, and the position or title of the individual(s) who allegedly discriminated against me during the period of my employment with the defendant(s) company is/are:

Iwanda Dickey Superintendant, African American, Female; John Douglas, Assistant Superintendant, Caucasian, Male

8. The alleged discrimination occurred on or about 8-24-2006

9. The nature of my complaint, i.e., the manner in which the individual(s) named above discriminated against me in terms of the conditions of my employment, is/are as follows:

My pay was frozen and my employment was terminated based on my age. They were aware that it would be difficult at age 50 to find employment

10. The alleged illegal activity took place at Eagles Nest Pre-K

11. I filed charges with the Equal Employment Opportunity Commission regarding defendant(s)' alleged discriminatory conduct on or about \*April 10, 2012. I have attached a copy of the Notice of Right to Sue letter issued by the Equal Employment Opportunity Commission. This letter was received by me on June 19, 2012.

See Note: EEOC Investigator filed wrong claim  
See Attached letter

12. I seek the following relief:

- (A) \_\_\_\_\_ recovery of back pay.
  - (B) \_\_\_\_\_ reinstatement to my former job or position.
  - (C) \_\_\_\_\_ front pay (where reinstatement is not suitable).
  - (D) X \_\_\_\_\_ damages (damages are recoverable only in age discrimination cases and only for "willful violations" of the Act.
  - (E) \_\_\_\_\_ injunctive relief.
  - (F) \_\_\_\_\_ expenses and attorney's fees.
  - (G) \_\_\_\_\_ other (describe below):
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Flonetta Roopman 9-19-08  
(Signature and date)

P.O. Box 248 Roberts, Ga 31871  
(Address)

478-836-4514  
(Phone Number)

Attachment: Right to Sue Notice